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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 00-00020 HG
)	
Plaintiff,)	INFORMATION
)	
vs.)	[18 U.S.C. § 371]
)	
)	
TAKAO ONO, (02))	
SHIHOKO SAKAMOTO, (04))	
SEAN NAKAYAMA, (05))	
)	
Defendants.)	
)	

INFORMATION

The United States Attorney charges:

Introduction

1. Under the Visa Waiver program, Japanese citizens who are visiting the United States for the purpose of sightseeing, may enter the United States without a visa as long as there is nothing in their background that would disqualify them from entering the United States.

2. Japanese citizens seeking to enter the United States to work in the United States must obtain a visa and the appropriate authorization from the Immigration and Naturalization Service.

3. Immigration law prohibits aliens from entering under the Visa Waiver program if they are entering for the purpose of working and prohibits them from remaining in the United States if they have worked after entering under the Visa Waiver program.

The Scheme

4. From an unknown date, but at least as early as June, 1999 to the present, in the District of Hawaii and elsewhere, the Defendants, TAKAO ONO, SHIHOKO SAKAMOTO, and SEAN NAKAYAMA, did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the United States Attorney to commit the following offenses against the United States:

a. causing aliens to enter the United States by a willfully false and misleading statement and the willful concealment of a material fact in violation of Title 8, United States Code, Section 1325(a)(3).

Manner and Means

5. It was part of the manner and means of the conspiracy that members of the conspiracy would recruit female Japanese citizens to do nude internet modeling in the United States.

6. It was part of the manner and means of the conspiracy that a member of the conspiracy would instruct the female Japanese citizens who were recruited to do nude internet modeling in the United States that they should tell the Immigration and Naturalization Service that their purpose in coming the United States was "sightseeing."

7. It was part of the manner and means of the conspiracy that the female Japanese citizens who were brought from Japan to the United States to do nude internet modeling would live and work at 1155 Hala Drive, Honolulu, Hawaii, a residence rented by Defendant Akira Sekimoto.

Overt Acts

8. In furtherance of the conspiracy and in order to effect the objectives thereof, the conspirators performed the following overt acts, among others, in the District of Hawaii and elsewhere:

a. On or about July 1, 1999, Defendant TAKAO ONO picked up Japanese citizen "Yukiko S." at the Honolulu International Airport. "Yukiko S." entered the United States from Japan under the Visa Waiver program. She claimed that her purpose was sightseeing, but in fact she was entering the United States to work as a nude internet model for the members of the conspiracy.

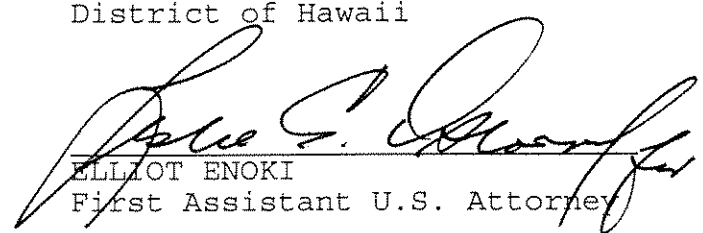
b. On or about November 30, 1999, Defendant Naoki Shimada sent an E-mail to Co-conspirator SHIHOKO SAKAMOTO giving her the flight information for the female Japanese citizens who were arriving in Honolulu on December 14, 1999.


e. On or about December 14, 1999, Defendant SEAN NAKAYAMA met Japanese citizens "Kaori I.", "Sawa O.", and "Mari T." at Honolulu International Airport and transported them to 1155 Hala Drive.

All in violation of Title 18, United States Code, Section 371.

DATED: Honolulu, Hawaii, May 4, 2000.


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UNITED STATES V. TAKAO ONO, ET AL.
"Information"